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 Brian Sandoval*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

MICHAEL ROWE, an individual,  
  
 Plaintiff,  
 vs.  
 THE STATE OF NEVADA (Tort Claims Act),  
 et al.  
  
 Defendants.

Case No. 2:22-cv-00014-CDS-DJA

**STIPULATION TO EXTEND  
 DEADLINE FOR RESPONSE  
 TO MOTION TO STAY  
 DISCOVERY (ECF NO. 20)**  
**(FIRST REQUEST)**

Defendants State of Nevada, erroneously named as “The State of Nevada (Tort Claims Act)” (“the State”) and Brian Sandoval (collectively with the State, “Defendants”), by and through counsel, and Plaintiff Michael Rowe in proper person, pursuant to LR IA 6-1, LR IA 6-2, hereby stipulate to extend the deadline for Plaintiff’s response to motion to stay discovery (ECF No. 20) to Monday, April 25, 2022.

This is the first request for an extension of time for Plaintiff to file a response to the Motion to Stay Discovery, which was filed on March 28, 2022. The deadline was Thursday, April 14, 2022. However, this request is based on good cause and is not for purpose of delay.

1. On March 28, 2022, Defendants filed the Motion to Stay and supporting documents. ECF Nos. 20, 21, 21-1, 21-2.

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1           2.       On March 28, 2022, Defendants mailed to Plaintiff's last known address copies of  
2 that day's filings, including the Motion to Stay and supporting documents (ECF Nos. 20, 21, 21-  
3 1, 21-2) as well as Mr. Sandoval's Motion to Dismiss (ECF No. 17).

4           3.       On March 28, 2022, Defendants also emailed to Plaintiff copies of that day's  
5 filings, including the Motion to Stay and supporting documents (ECF Nos. 20, 21, 21-1, 21-2) as  
6 well as Mr. Sandoval's Motion to Dismiss (ECF No. 17).

7           4.       On April 1, 2022, the Court granted in part and denied in part the parties' Discovery  
8 Plan and Scheduling Order. ECF No. 24.

9           5.       On April 4, 2022, the Court filed notices of returned mail related to Minute Orders  
10 ECF Nos. 12, 23 that the Court had mailed to Plaintiff's last known address. ECF Nos. 26, 27.  
11 Thereafter, Defendants contacted Plaintiff to confirm his address. Plaintiff responded that his  
12 address had not changed, and the Post Office had made an error.

13           6.       On April 11, 2022, Plaintiff filed his Opposition to Mr. Sandoval's Motion to  
14 Dismiss. ECF No. 28.

15           7.       On the afternoon of Friday, April 15, 2022, Defendants learned that the envelope  
16 containing the Motion to Stay and supporting exhibits, which Defendants had mailed to Plaintiff's  
17 last known address on March 28, 2022, was returned to sender.

18           8.       On the morning of Monday, April 18, 2022, the parties met and conferred via email.  
19 Plaintiff stated that he had thought discovery had been set and that he intended to file a response  
20 to the Motion to Stay Discovery.

21           9.       The parties agreed to an extension to Monday, April 25, 2022 for any response to  
22 the Motion to Stay (ECF No. 20).

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1 Upon agreement, the parties request that this Court grant Plaintiff an extension until  
2 Monday, April 25, 2022 to file a response to the Motion to Stay (ECF No. 20). This is the first  
3 request for an extension of this deadline.

4 DATED this 18th day of April 2022.

DATED this 18th day of ~~March~~ <sup>April</sup> 2022.


AARON D. FORD  
Attorney General

5  
6  
7 By:

  
MICHAEL ROWE

*Plaintiff, in proper person*

By:

  
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*Defendants State of Nevada and  
Brian Sandoval*

**ORDER**

IT IS SO ORDERED.

Dated: April 19, 2022

  
United States Magistrate Judge